

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THE TRAVELERS INDEMNITY CO. OF)
ILLINOIS n/k/a TRAVELERS PROPERTY)
CASUALTY CO. OF AMERICA,)
Plaintiff,)
vs.) No. 05 C 5724
CARRAMERICA REALTY, LP and) Honorable Judge George M. Marovich
RICHARD WALLACE,) Magistrate Judge Geraldine Soat Brown
Defendants.)

FILED
JAN 25 2006

AG
MICHAEL W. DORRINS
U.S. DISTRICT COURT

ANSWER TO COMPLAINT

Now comes the Defendant, Richard Wallace, by and through his attorneys, Guth, Reinke & Farnan, Ltd., and for his answer to the complaint for declaratory judgment, states as follows:

1. Admits
2. The Defendant is without sufficient knowledge as to the truth of the allegations contained in paragraph 2, and therefore, neither admits nor denies same, but demands strict proof thereof.
3. The Defendant is without sufficient knowledge as to the truth of the allegations contained in paragraph 3, and therefore, neither admits nor denies same, but demands strict proof thereof.
4. Admits.
5. Denies.
6. Denies.
7. Denies.
8. Admits.

9. Admits.

10. Admits.

11. Admits.

12. Admits.

13. Admits.

14. Admits.

15. Admits.

16. Admits that allegation number 16 is included in Defendant Wallace's amended complaint but denies that allegation number 16 includes all complained of acts of negligence in the amended complaint.

17. Admits.

18. Admits that the Amended Complaint includes these allegations.

19. Admits.

20. Denies that the Amended Complaint uses the term "accidentally." Admits to the remaining allegations contained in paragraph 20.

21. Admits.

22. Admits.

23. The Defendant is without sufficient knowledge as to the truth of the allegations contained in paragraph 23, and therefore, neither admits nor denies same, but demands strict proof thereof.

24. Admits that a Travelers policy is attached as Exhibit F, but is without sufficient knowledge as to whether said policy applies to the instant matter, and demands strict proof thereof.

25. Admits.

26. Admits.

27. Admits.

28. Admits.

29. Admits.

30. This Defendant incorporates its answers to paragraphs 1 through 29 as though fully set forth herein.

31. Denies.

32. Admits.

33. Admits.

34. The Defendant is without sufficient knowledge as to the truth of the allegations contained in paragraph 34, and therefore, neither admits nor denies same, but demands strict proof thereof.

35. The Defendant is without sufficient knowledge as to the truth of the allegations contained in paragraph 35, and therefore, neither admits nor denies same, but demands strict proof thereof.

36. The Defendant is without sufficient knowledge as to the truth of the allegations contained in paragraph 36, and therefore, neither admits nor denies same, but demands strict proof thereof.

37. Denies.

38. Denies.

WHEREFORE, for the foregoing reasons, this Defendant demands judgment in his favor and for costs incurred.

Respectfully submitted,

RICHARD WALLACE

By: 

Guth, Reinke & Farnan, Ltd.
His Attorneys

GUTH, REINKE & FARNAN, LTD.
161 N. Clark, Suite 2900
Chicago, Illinois 60601
(312) 855-0840